



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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August 26, 2002

David S. Rosenzweig
Keegan, Werlin and Pabian, LLP
21 Custom House Street
Boston, MA 02110

Re: Colonial Gas Company d/b/a/KeySpan Energy Delivery and NSTAR Gas Company.
D.T.E. 02-44

Dear Mr. Rosenzweig:

Enclosed please find the Department of Telecommunications and Energy's Second Set of Record Requests to KeySpan Energy Delivery New England and NSTAR ("the Companies") issued in the above-captioned matter. Please submit the Companies' responses before 5 p.m., Thursday, August 29, 2002.

Thank you for your attention in this matter.

Sincerely,

Elizabeth A. Cellucci
Hearing Officer

Enc.
cc: Mary Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SECOND SET OF RECORD REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO KEYSpan ENERGY DELIVERY NEW ENGLAND AND NSTAR GAS COMPANY
D.T.E. 02-44

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to KeySpan Energy Delivery New England ("KeySpan") and NSTAR Gas Company ("NSTAR"), or collectively "the Companies", the following Record Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn, and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the response to: (1) Elizabeth Cellucci, Hearing Officer; (2) Kevin Brannelly, Rates and Revenues Division; (2) Paul Osborne, Rates and Revenues Division; (3) George Yiankos, Gas Division; (4) Xuan Yu, Rates and Revenues Division; and (5) Becky Hanson, Legal Division.
8. Responses are due by 5 p.m., Thursday, August 29, 2002.

DTE-RR 2-1 Please refer to DTE-RR-1. The Companies' response states that NSTAR Gas does not plan to seek recovery of billing rate differentials in future CGA filings. Please confirm that this means that NSTAR Gas will absorb any difference in the billing rates.

DTE-RR 2-2 Please refer to DTE-RR-7. The Record Request refers to "customers using heat predominantly during off-peak periods."
a) How are these customers defined by the Companies?
b) Please explain how these customers are identified in the attachments to DTE-RR-7.

DTE-RR 2-3 Please refer to the attachments to DTE-RR-7. Please explain what the heading "SCGA" stands for.